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August 27, 1992

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Federal Communications Commission
Office of the Secretary

ORIGINAL
FILE

Donna R. Searcy
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Mail Stop 1170
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Dear Ms Searcy:

Re: CC Docket No. 92-77  Billed Party Preference for 0+ InterLATA Calls

On behalf of Pacific Bell and Nevada Bell, please find enclosed an original and six copies of its "Reply Comments" in the above proceeding.

Please stamp and return the provided copy to confirm your receipt. Please contact me should you have any questions or require additional information concerning this matter.

Sincerely,

Celia Nogales/WFA

Enclosures

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AUG 27 1992

Before the
Federal Communications Commission
Washington, DC 20554

Federal Communications Commission
Office of the Secretary

In the Matter of)
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Billed Party Preference) CC Docket No. 92-77
for 0+ InterLATA Calls)
)
_____)

REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

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TABLE OF CONTENTS

	<u>Page</u>
SUMMARY	ii
I. BILLED PARTY PREFERENCE IS IN THE PUBLIC INTEREST	2
II. THE PACIFIC COMPANIES' SERVICE DESIGN IS SUPERIOR TO THAT SUGGESTED BY OTHER PARTIES	3
III. 14 DIGIT SCREENING IS NOT NECESSARY	6
IV. INMATE PHONES, LIKE ALL TELEPHONES, SHOULD BE SUBJECT TO BPP	8
V. COST RECOVERY MUST BE ASSURED	10
VI. CONCLUSION	12

SUMMARY

The comments filed in this proceeding reveal vast differences of opinion about the implementation of BPP. Since a common design of BPP has not yet been formulated, the comments do not reflect an apple-for-apple comparison of issues. Commenters' views of how BPP will operate vary greatly. The Pacific Companies believe that its design of BPP should be adopted since it solves many problems raised by commenters. For example, call segmentation, which divides responsibility for the call between LECs and OSPs, can assure an orderly call handling approach.

The Pacific Companies strongly believe that ubiquity is a key ingredient to the success of BPP. All locations and carriers should use BPP. Also, the Pacific Companies do not believe 14 digit screening in LIDB is appropriate, because of the very difficult security and administrative issues associated with it. However, a similar result can occur by adoption of the Pacific Companies' shared line number approach used by AT&T in the past.

Finally, cost recovery must be assured. While BPP has many consumer and market advantages, it is costly to implement. The Pacific Companies anticipate recovering the costs on all operator handled calls. By implementing BPP in this manner, consumers and the industry will benefit from a less confusing, more competitive O+ market.

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REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL

Pacific Bell and Nevada Bell (the "Pacific Companies") file their reply comments pursuant to the Commission's Notice of Proposed Rulemaking ("NPRM") released May 8, 1992.

The Comments on Billed Party Preference ("BPP") revealed strong differences of opinion as to whether BPP is desirable, feasible or cost justified. One main problem in trying to interpret the comments filed is that there is not one industry view of how BPP will generally operate, or how BPP would apply in different technical circumstances. Therefore, different commenters have premised their responses to the Commission based on their version of BPP. As the Pacific Companies will show, our design of BPP is more advanced than most submitted, and should be the standard design adopted by the Commission and the industry.

Absent a specific design of BPP, and reliable feature prices from switch vendors, costs will continue to be speculative. The Commission may want to consider a subsequent look at costs once a common design is determined. As we noted in our Comments, cost recovery must be assured before BPP is mandated.

I. BILLED PARTY PREFERENCE IS IN THE PUBLIC INTEREST

BPP will allow universal 0+ dialing. 0+ dialing is the preferred dialing scheme and is necessary for a truly competitive marketplace. Currently, carriers must instruct their customers to use access code dialing to complete calls.¹ Access code dialing, while providing some customer choice, cannot compete equally with 0+ dialing.² Access code dialing is cumbersome, and in many cases requires dialing of many extra digits, especially if 0+ dialing is attempted first. In that case, an end user dials 0+ called number (and perhaps the calling card number), then, when the call cannot be completed, hangs up and starts again with access code dialing. The perceived time to complete such a call is very long from an end user's perspective.³ BPP will not only shorten the time and amount of dialing it takes for an end user to access the chosen carrier, but with deployment of OSS7, actual call set up time in the network will decrease.

BPP will also let end users have calling card features that work ubiquitously. Certain providers currently offer some features,⁴ however, these features do not share common dialing

¹ Capital Network System Comments, pp. 8-9; NPRM, n. 25.

² See, for example, Illinois Commerce Commission, et al., Comments, p. 7; Florida Public Service Commission Comments, pp. 3-4.

³ Thus, it is ironic that the Dallas-FortWorth Airport Commission used "to the business traveller...time is critical" as a reason not to support BPP.

⁴ See, for example, LinkUSA Comments, p. 4.

procedures, and they only work when calling from a particular telephone. Only with BPP can end users be assured that the desired features will work on an 0+ basis in the same way no matter where the call originates. These features will benefit any carrier's calling card. As calling card features become more popular, this necessity will increase in importance. Contrary to the belief of some manufacturers,⁵ BPP will therefore increase innovation of new features, since only with BPP can seamless 0+ features work.

II. THE PACIFIC COMPANIES' SERVICE DESIGN IS SUPERIOR TO THAT SUGGESTED BY OTHER PARTIES

The service designs set out by many commenters illustrate the differing views of how BPP would operate. Some commenters believe two operators would always be necessary⁶ or that two database queries would be required.⁷ As we explained in our comments, the Pacific Companies' design minimizes or solves these problems by employing call segmentation.⁸ Call

⁵ NYCOM Information Services Inc., et al., ("Nycom") Comments, p. 8; LinkUSA Comments, p. 4.

⁶ The Greater Orlando Aviation Authority Comments, p. i; United States Telephone Association ("USTA") Comments, p. 7; Competitive Telecommunications Association ("CompTel") Comments, p. 14; Capital Network System Inc. ("CNS") Comments, p. 8.

⁷ CompTel Comments, p. 18, NYCOM Comments, p. 12.

⁸ Cleartel Communications, Inc., et al., Comments, noted at footnote 24 that IXCs would need additional access facilities for BPP, citing to a Pacific Bell use of a San Francisco Operator Base Station as a back up for calls originating the Los Angeles LATA. Pacific Bell does not perform any operator services function in this manner from anywhere in its region and is unaware of why Cleartel, et al. believes this to be the case.

segmentation means that the responsibility for completing the operator-assisted call is split between the local exchange carrier ("LEC") and the Operator Service Provider ("OSP").⁹

Our design is for the LEC to handle only the routing of a BPP call. The Pacific Companies' approach is for the LEC to determine carrier routing plus validation information from Line Information Data Base ("LIDB") and then pass the call, with the associated validation information, to the OSP for completion (or further OSP processing if the validation information was negative).¹⁰ For collect or third party calls, the LEC performs the LIDB query then sends the call to the OSP to determine the name of the calling party and/or acceptance of the call.¹¹ Therefore, while two operators may be involved where Automated Alternate Billing System ("AABS") is not deployed, each operator will request different information, so input of redundant information will be eliminated.

Some parties mistakenly believe that two database queries will be necessary.¹² If a proprietary card is used, no

⁹ The term OSP in these comments refers to both traditional operator service providers as well as interexchange carriers that issue 0+ calling cards.

¹⁰ The LEC should not be liable for how the OSP handles the call once it is handed off to the OSP.

¹¹ Sprint's service design proposes that the LEC perform the OSP operator function so that the LEC operator asks the caller's name, does the LIDB query, and then determines if a call is accepted (Sprint Comments, p. 23). The Pacific Companies' proposal instead segments the call along functional lines, rather than requiring the LEC to perform OSP operator functions.

¹² CompTel Comments, p. 18.

LIDB query will be launched; the switch in most cases will recognize that it is a proprietary card and forward the call to the card-issuing OSP. Validation will then be the responsibility of this card issuer.¹³ For line numbered cards, the LEC will query LIDB for two pieces of information: the carrier identification and validation. The carrier identification will be used for routing the call. The validation information will not be acted upon by the LEC, it will be passed along to the OSP. With this design, two separate queries are unnecessary.

MessagePhone Inc. submitted its proposal for a service design which involves the BPP functionality on the line side of an end office switch.¹⁴ However, the comments only addressed payphones, whereas BPP must be applied from all telephones in order to truly benefit the end user. Besides the nonubiquitous implementation of BPP suggested by MessagePhone, the costs cited by MessagePhone show that this is an expensive technology in itself (even when only applied to payphones). Also, we anticipate there will be additional costs associated with the insertion of this device into the live network, including monitoring and maintenance of the unit, and its ability to interface with our provisioning, administrative and billing systems. Therefore, the MessagePhone proposal should not be adopted.

¹³ The Pacific Companies' BPP design accommodates IXC CIID cards and 891 cards.

¹⁴ MessagePhone Comments, pp. 16-18.

Visa and Mastercard have commented that the Commission should allow commercial credit cards to participate in BPP.¹⁵ They are correct that the technology exists to recognize credit cards within the operator service switch. However, if commercial credit cards were to participate in BPP, certain requirements would need to be met. These requirements include: 1) a LIDB-type database, 2) the chosen primary and secondary carrier for their customer, and 3) the ability to access a validation system. The Pacific Companies would not object to including commercial credit cards within the scope of BPP, as long as these requirements were met.

III. 14 DIGIT SCREENING IS NOT NECESSARY

Interexchange carriers have commented that 14 digit screening in LIDB is essential for a competitive marketplace.¹⁶ 14 digit screening would allow customers to have multiple line-numbered cards assigned to various carriers; the Personal Identification Number ("PIN") on each card would be associated with a particular OSP. Many issues are raised by this proposal.

For example, if multiple PINs were assigned to a calling card, some centralized PIN administration center (either through the LEC or an independent agency) would need to be created to

¹⁵ Mastercard Int'l Inc. and Visa U.S.A., Inc. Comments at pp. ii, 13-16.

¹⁶ MCI Comments, p. 8; Sprint Comments, p. 11.

serve as a clearinghouse for PIN assignment and coordination, so that the same PIN was not assigned twice. Also, the clearinghouse would need to coordinate communications regarding lost or stolen cards. A centralized PIN administration center, however, raises not only cost recovery issues, but also substantial security issues relating to PINs. Not only will PINs be assigned and communicated to the carrier, but the PIN will also need to be loaded into LIDB, and possibly other OSP databases. The increase in the number of times PIN information is transmitted and communicated increases the vulnerability of the PIN to incursion into the network.

Other administration costs involve changes to LEC support systems and billing systems to handle recognition of different PIN designations. Further, customer confusion resulting from multiple carrier designations on line numbered cards is likely.

Finally, as mentioned in our Comments,¹⁷ the Pacific Companies have planned on using multiple PINs for proprietary subaccount billing. It is not clear whether multiple PINs can be used for both carrier routing and subaccount billing purposes.

The Commission does not need to delve into the many complexities raised by 14 digit screening. The concerns raised by the OSPs (that they must have the ability to utilize line numbered cards) can be solved by a different approach. The Pacific Companies continue to be willing to share its line

¹⁷ Pacific Bell and Nevada Bell Comments, pp. 16-17.

numbered card with any OSP as it has done in the past with AT&T. A shared card means that for any line number, one OSP alone or in combination with the Pacific Companies, can issue a line numbered calling card with a PIN that is assigned by the Pacific Companies. If an end user wants calling cards from both the OSP and the Pacific Companies, the same PIN is assigned to both, and that number and PIN are loaded into LIDB. End users using calling cards, under BPP, will thus have their carrier of choice carry the call, and will have the benefit of line numbered cards. This approach solves the OSP concerns about a perceived inequity in not having the ability to assign line numbered calling cards. Thus, instead of imposing a very costly, confusing and administratively burdensome 14 digit screening requirement, the Commission can require sharing of the line numbered cards with the OSP chosen by the end user.

IV. INMATE PHONES, LIKE ALL TELEPHONES, SHOULD BE SUBJECT TO BPP

Many Departments of Correction filed comments urging that BPP should not be implemented within a correctional or detention environment.¹⁸ These entities argue that BPP poses a security threat, and that fraud activities could increase. The Pacific Companies believe that BPP should apply from all telephones. Most controlled access phones inside correctional institutions allow only collect calls to be made. Therefore,

¹⁸ Arizona Department of Corrections Comments, p. 7; South Carolina Jail Administrators' Association Comments, p. 3.

families of inmates must pay collect charges from the operator service provider presubscribed to that telephone line. With BPP, the families of inmates choose the carrier of the call, and are not subjected to exorbitant rates. The choice should be in the hands of the consumer. BPP provides that.

The Inmate Calling Service Providers Task Force of the American Public Communications Council ("ICSPTF"), in urging that BPP not apply to inmate phones, argues that state-mandated restrictions on inmate phones could be compromised if multiple OSPs can carry calls originating from correctional institutions.¹⁹ The Pacific Companies do not anticipate that BPP will create any additional fraud opportunities even from correctional institutions. The LEC can place appropriate restrictions on calls originating from correctional institutions (as long as the OSP can receive and interpret the restriction). Our fraud control unit operates before calls go to the network. BPP would therefore not affect the operation of this unit. This state-of-the-art system monitors billing numbers and calling and called numbers for suspicious activity. Further, with ANI 7 forwarded to the desired OSP, that OSP will know that the calls originated from an inmate location. Those OSPs can then take appropriate steps to prevent fraudulent activity. As an additional security measure, LECs can install sophisticated monitoring devices at the validation database to monitor calls to

¹⁹ ICSPTF Comments, pp. 14-16.

and from sensitive locations.²⁰ These elements combined may not only prevent additional fraud from taking place, but should reduce fraud from current levels.²¹

V. COST RECOVERY MUST BE ASSURED

The Pacific Companies strongly believe the costs incurred to implement BPP must be recovered. In its Comments, the Pacific Companies did not include the costs of BPP for 0-calls since 0- is for intraLATA service only. However, if BPP is expanded to include 0- calls, additional network implementation upgrades of approximately \$2 million plus annual labor costs of approximately \$9 million will be incurred.

Many regional Bell Operating Companies provided specific costs for each of the four scenarios listed in paragraph 25 of the NPRM. Most regions noted the uncertain nature of the costs quoted, since vendor prices have not yet been available.²² Nevertheless, most companies, like the Pacific Companies, provided their best estimate of what those costs will be.

²⁰ The Pacific Companies are beginning to install such a system this month.

²¹ This discussion assumes that the Part 68 restriction noted at para. 31 of the NPRM is in place.

²² See, for example U S West Communications ("U S West") Comments at p. 6; BellSouth Telecommunications ("BellSouth") Comments, p. 8; NYNEX Telephone Companies ("NYNEX") Comments; p. 5 at fn. 5; Ameritech Operating Companies ("Ameritech") Comments, p. 18.

We believe that for BPP to be effective and cost justified, it must be available from all telephones. The Pacific Companies agree with the comments of other regions that applying BPP only to payphones, or payphones plus other aggregator locations will not substantially reduce the implementation costs of BPP.²³ Most of the costs associated with BPP are network costs which will be needed whether BPP is established from every telephone or simply from a limited subset of telephone locations. The network costs associated with BPP prepared for this response are those directly attributable to BPP and have no other products and/or services scheduled or planned that would share the usage of these elements. These elements include OSS7 Signaling and BPP Feature Packages, additional peripheral frames and upgrades to existing frames in OSS switches that would not otherwise have been installed.

The Pacific Companies agree with the Commission that BPP should be considered a new service under Price Caps.²⁴ The Pacific Companies believe that costs should be recovered by creation of a new rate element or elements under Part 69. These new rate elements will recover both implementation and recurring costs. The Pacific Companies estimate that the BPP rate, based on our current cost estimate and demand figures will be in the

²³ See Nynex Comments, p. 5; Bell Atlantic Comments, Attachment A.

²⁴ NPRM, fn. 30.

range of \$0.09-\$0.11 per 0+/0- call.²⁵ Of course, the speculative nature of the costs means that this unit cost is tentative at best. Only after the service design is finally determined, and the vendors have set prices, can a true cost estimate be calculated.

The Pacific Companies anticipate that the rate element(s) will be collected on all 0+ and 0- calls (whether or not completed) and however they are billed.

VI. CONCLUSION

The Pacific Companies support BPP in the form described in the comments and these reply comments. BPP should apply from all telephone locations, and should apply to all providers. Implementation and recurring costs must be recovered by the LECs as a prerequisite to mandating BPP. Only after the service design is finally determined, and the vendors have set prices, can a true cost estimate be calculated. Cost recovery must be assured by creation of a new rate element(s) for a BPP call. If BPP is mandated in this manner, consumers will benefit by gaining

²⁵ This assumes a five-year recovery of 100% of the implementation costs, includes all interLATA (intrastate and interstate) attempts and completions for 0+ and 0- calls. Also, the labor rates used to calculate these costs have not been adjusted to reflect the recent collective bargaining agreements.

equal access when making an alternate billed call, the OSP industry will benefit by being on a competitive par with AT&T for O+ dialing, and the industry as a whole will benefit from more usage of O+ dialing that will result from the convenience associated with BPP.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, S. L. McGreevy, hereby certify that copies of the foregoing "REPLY COMMENTS OF PACIFIC BELL AND NEVADA BELL" were served by hand or by first-class United States mail, postage prepaid, upon the parties appearing on the attached service list this 27th day of August, 1992.

By: *S. L. McGreevy*
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